

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF PENNSYLVANIA  
ERIE DIVISION

NIKYAHETTA NELSON ,  
Plaintiff

v.

COUNTY OF ERIE, MAJOR GARY  
SEYMOUR, DEPUTY WARDEN OF  
SECURITY, and STAIRWAYS  
BEHAVIORAL HEALTH  
Defendants

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: Docket No. 1:19-cv-00218-SPB  
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: *Electronically Filed*  
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: **JURY TRIAL DEMANDED**

**RESPONSE TO JOINT MOTION TO COMPEL DISCOVERY RESPONSES**

NOW COMES the Plaintiff, Nikyahetta Nelson, by counsel and in answer to the  
“Joint Motion to Compel Discovery Responses” respectfully representing:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. There is nothing in Plaintiff’s testimony that gives anyone any reason to believe that the responses to the interrogatories were deficient, nor do the fevered statements in the attached correspondence support such an assertion. Defendants utterly fail to designate or specify what deficiencies they are claiming and it is unclear from the accusations thrown about in the various emails as to deficiencies they are claiming.
7. It is admitted that Attorney Carey sent an email threatening action.

8. Admitted that additional email correspondence was exchanged.

9. Admitted.

10. It is denied that Plaintiff has refused to provide responses to any Defendant's discovery requests. Plaintiff has, in good faith, fully complied with all discovery requests.

11. As is clear from the correspondence attached to the Defendants' Motion, no such medical records exist other than psychotherapy notes which are privileged. Further, Plaintiff is not claiming a psychological injury. She did have to return to therapy as the result of the abuse heaped upon her by the Defendants' discriminatory treatment of her.

WHEREFORE, Plaintiff respectfully requests that Defendants' Motion be denied.

Respectfully submitted,

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